



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

*The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007*

**TO BE FILED UNDER SEAL**

January 24, 2022

The Honorable Ona T. Wang  
Daniel Patrick Moynihan U.S. Courthouse  
500 Pearl St.  
New York, NY 10007-1312

**Re: *United States v. Sune Gaulsh*, 21 Mag. 5195**

Dear Judge Fox:

On May 14, 2021, the above-captioned sealed Complaint and an accompanying sealed arrest warrant were filed against defendant Sune Gaulsh, who unlawfully removed his minor son from the United States in or about November 2020. On August 23, 2021, U.S. Magistrate Judge Gabriel W. Gorenstein issued a limited unsealing order permitting the Government to disclose the Complaint and arrest warrant for the purpose of coordinating with foreign law enforcement authorities to apprehend the defendant and bring him to the United States.

In or about October 2021, the defendant was arrested in Serbia in connection with this case, and the Government is awaiting a decision from Serbian authorities on extradition. Given the defendant's detention status, and to facilitate the parties' ability to confer on the defendant's possible consent to extradition, the Government asks that the Court enter an order unsealing the Complaint and permitting its entry on the public docket.

Respectfully submitted,

DAMIAN WILLIAMS  
United States Attorney

By:   
Jane Y. Chong  
Assistant United States Attorney  
(917) 763-3172

**SO ORDERED:**



THE HONORABLE ONA T. WANG  
UNITED STATES MAGISTRATE JUDGE  
SOUTHERN DISTRICT OF NEW YORK

Dated: January 24, 2022